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BIRRC

June 24, 2019

Jocelyn Boyd Chief Clerk and Administrator South Carolina Public Service Commission Synergy Business Park, The Saluda Building 101 Executive Center Drive Columbia SC 29210

Re: Request of the Office of Regulatory Staff Regarding Universal Service Fund and Lifeline Program Administrative Expenses

Docket No. 1997-239-C

Dear Ms. Boyd:

I am writing on behalf of the South Carolina Telephone Coalition ("SCTC") regarding the request made by the Office of Regulatory Staff ("ORS") by its letter dated June 11, 2019 in the above-referenced docket. In its letter, ORS requests that the State USF administrative expense amounts previously approved by the Commission for USF and Lifeline administration be combined into one general USF administrative expense account to be used solely for activities related to the administration of both the USF and the Lifeline Program.

SCTC supports ORS's request. ORS is not seeking additional funding, but is seeking flexibility to use existing funding in a manner that meets the needs of the State USF and Lifeline program.

SCTC agrees that granting ORS's request will allow ORS to continue to effectively manage the USF and Lifeline Programs with existing administrative expense funding.

Very truly yours,

Burr Forman McNair

Margaret M Fox

MMF/khh

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cc: Nanette S. Edwards, Esq. Jeffrey M. Nelson, Esq. Joseph Melchers, Esq.